

# Exhibit A-1



## Notice of Service of Process

null / ALL  
Transmittal Number: 23066327  
Date Processed: 04/16/2021

**Primary Contact:** Cynthia Jones  
Compass Group North America  
2400 Yorkmont Rd  
Charlotte, NC 28217-4511

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<b>Entity:</b>	Compass Group USA, Inc. Entity ID Number 3289259
<b>Entity Served:</b>	Compass Group USA, Inc.
<b>Title of Action:</b>	Emma Dermody vs. Crothall Healthcare Inc.
<b>Matter Name/ID:</b>	Emma Dermody vs. Crothall Healthcare Inc. (11147244)
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Personal Injury
<b>Court/Agency:</b>	Westchester County Supreme Court, NY
<b>Case/Reference No:</b>	52600/2021
<b>Jurisdiction Served:</b>	New York
<b>Date Served on CSC:</b>	04/15/2021
<b>Answer or Appearance Due:</b>	30 Days
<b>Originally Served On:</b>	Secretary of State in NY on 03/16/2021
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Ira H. Lapp 845-638-3012

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

State of New York - Department of State  
Division of Corporations

Party Served:  
COMPASS GROUP USA, INC.

Plaintiff/Petitioner:  
DERMODY, EMMA

C/O CORPORATION SERVICE COMPANY  
80 STATE STREET  
ALBANY, NY 12207-2543

Dear Sir/Madam:

Enclosed herewith is a legal document which was served upon the Secretary of State on 03/16/2021 pursuant to SECTION 306 OF THE BUSINESS CORPORATION LAW.

This copy is being transmitted pursuant to such statute to the address provided for such purpose.

Very truly yours,  
Division of Corporations

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER**

-----X  
EMMA DERMODY,

Plaintiff/Petitioner,

- against -

Index No. 52600/2021

CROTHALL HEALTHCARE INC. and  
COMPASS GROUP USA, INC.,

Defendant/Respondent.  
-----X

**NOTICE OF ELECTRONIC FILING  
(Consensual Case)  
(Uniform Rule § 202.5-b)**

**You have received this Notice because:**

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

**You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.**

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: [www.nycourts.gov/efile-unrepresented](http://www.nycourts.gov/efile-unrepresented) or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)



To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

### Information for Attorneys

An attorney representing a party who is served with this notice must either consent or decline consent to electronic filing and service through NYSCEF for this case.

Attorneys registered with NYSCEF may record their consent electronically in the manner provided at the NYSCEF site. Attorneys not registered with NYSCEF but intending to participate in e-filing must first create a NYSCEF account and obtain a user ID and password prior to recording their consent by going to [www.nycourts.gov/efile](http://www.nycourts.gov/efile)

Attorneys declining to consent must file with the court and serve on all parties of record a declination of consent.

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov)).

Dated: 03/08/2021

IRA H. LAPP, ESQ.

Name

NEIMARK COFFINAS & LAPP LLP

Firm Name

37 CONGERS RD

NEW CITY, NY 10956

Address

(845)-638-3012/888-735-3525

Phone

tconklin@ncl.law

E-Mail

To: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2/24/20

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NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 03/08/2021

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER**

EMMA DERMODY,

Plaintiff(s).

-against-

CROTHALL HEALTHCARE INC. and COMPASS  
GROUP USA, INC.,

Defendant(s).


Index No.: 52600/2021

Date Purchased: 03/08/2021

**SUMMONS**Plaintiff designates Westchester  
County as the place of trial.The basis of venue is:  
Plaintiff's ResidencePlaintiff resides at:  
130 Nob Hill Drive  
Elmsford, New York 10523  
County of Westchester**To the above named Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New City, New York  
March 5, 2021

  
\_\_\_\_\_  
IRA H. LAPP, ESQ.  
NEIMARK COFFINAS & LAPP LLP  
Attorneys for Plaintiff(s)  
EMMA DERMODY  
37 Congers Road  
New City, New York 10956-5135  
(845) 638-3012

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NYSCEF DOC. NO. 1

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TO:  
CROTHALL HEALTHCARE INC.  
C/O SECRETARY OF STATE

COMPASS GROUP USA, INC.  
C/O SECRETARY OF STATE

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER

EMMA DERMODY,

Plaintiff(s).

-against-

CROTHALL HEALTHCARE INC. and  
COMPASS GROUP USA, INC.,

Defendant(s).

Index No.: 52600/2021

Date Purchased: 03/08/2021

**VERIFIED COMPLAINT**

Plaintiff, by her attorneys, **NEIMARK COFFINAS & LAPP LLP**, complaining of the Defendants, respectfully alleges, upon information and belief:

1. At all times herein mentioned, Plaintiff **EMMA DERMODY** was and still is a resident of the County of Westchester, State of New York.

2. That at all times hereinafter mentioned, the Defendant **CROTHALL HEALTHCARE INC.** was, and still is, a domestic corporation duly formed and existing under and by virtue of the laws of the State of New York.

3. That at all times hereinafter mentioned, the Defendant **CROTHALL HEALTHCARE INC.** was, and still is, a foreign corporation duly authorized to conduct and transact business in the State of New York.

4. That at all times hereinafter mentioned, the Defendant **COMPASS GROUP USA, INC.** was, and still is, a domestic corporation duly formed and existing under and by virtue of the laws of the State of New York.

5. That at all times hereinafter mentioned, the Defendant **COMPASS GROUP USA, INC.** was, and still is, a foreign corporation duly authorized to conduct and transact business in the State of New York.

6. On September 8, 2020, Plaintiff **EMMA DERMODY** was lawfully about the



premises located at Westchester Medical Center, 100 Woods Road, Valhalla, New York.

7. On September 8, 2020, Plaintiff **EMMA DERMODY** was lawfully about the interventional radiology room at the premises located at Westchester Medical Center, 100 Woods Road, Valhalla, New York.

8. On September 8, 2020, while Plaintiff **EMMA DERMODY** was lawfully about the aforesaid location, Plaintiff **EMMA DERMODY** was caused to sustain serious and permanent injuries due to the negligent operation of a Stryker bed.

9. That at all times hereinafter mentioned, the Defendant, **CROTHALL HEALTHCARE INC.** owned the aforesaid Stryker bed.

10. That at all times hereinafter mentioned, the Defendant, **CROTHALL HEALTHCARE INC.** was a lessor of the aforesaid Stryker bed.

11. That at all times hereinafter mentioned, the Defendant, **CROTHALL HEALTHCARE INC.** was a lessee of the aforesaid Stryker bed.

12. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **CROTHALL HEALTHCARE INC.** managed the aforesaid Stryker bed.

13. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **CROTHALL HEALTHCARE INC.** controlled the aforesaid Stryker bed.

14. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **CROTHALL HEALTHCARE INC.** maintained the aforesaid Stryker bed.

15. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **CROTHALL HEALTHCARE INC.** operated the aforesaid Stryker bed.

16. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **CROTHALL HEALTHCARE INC.** repaired the aforesaid Stryker bed.

17. That at all times hereinafter mentioned, the Defendant, **COMPASS GROUP USA, INC.** owned the aforesaid Stryker bed.

18. That at all times hereinafter mentioned, the Defendant, **COMPASS GROUP USA, INC.** was a lessor of the aforesaid Stryker bed.

19. That at all times hereinafter mentioned, the Defendant, **COMPASS GROUP USA, INC.** was a lessee of the aforesaid Stryker bed.

20. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **COMPASS GROUP USA, INC.** managed the aforesaid Stryker bed.

21. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **COMPASS GROUP USA, INC.** controlled the aforesaid Stryker bed.

22. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **COMPASS GROUP USA, INC.** maintained the aforesaid Stryker bed.

23. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **COMPASS GROUP USA, INC.** operated the aforesaid Stryker bed.

24. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **COMPASS GROUP USA, INC.** repaired the aforesaid Stryker bed.

25. The above mentioned occurrence, and the results thereof, were caused by the joint, several and concurrent negligence of the Defendants and/or said Defendants' agents, servants, employees and/or licensees in the ownership, operation, management, repair, maintenance and control of the aforesaid Stryker bed.

26. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

27. That as a result of the foregoing, Plaintiff was caused to sustain serious injuries and to have suffered pain, shock, mental anguish; that these injuries and their effects will be permanent; as a result of said injuries Plaintiff was caused, and will continue to be caused, to incur expenses for medical care and attention; and Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

28. That this action falls within one or more of the exceptions as set forth in CPLR Section 1602.

29. That by reason of the negligence of the Defendants the Plaintiff **EMMA DERMODY** sustained damages which exceed the jurisdictional limits of all lower Courts which

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would otherwise have jurisdiction.

**WHEREFORE**, Plaintiff demands judgment against the Defendants herein in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: New City, New York  
March 5, 2021


  
\_\_\_\_\_  
IRA H. LAPP, ESQ.  
NEIMARK COFFINAS & LAPP LLP  
Attorneys for Plaintiff(s)  
EMMA DERMODY  
37 Congers Road  
New City, New York 10956-5135  
(845) 638-3012

**ATTORNEY'S VERIFICATION**

IRA H. LAPP, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury: I am an attorney at NEIMARK COFFINAS & LAPP LLP, attorneys of record for Plaintiff(s), EMMA DERMODY. I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff is not presently in the county wherein I maintain my offices.

DATED: New City, New York  
March 5, 2021

  
\_\_\_\_\_  
IRA H. LAPP

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER

---

EMMA DERMODY,

Plaintiff(s),

-against-

CROTHALL HEALTHCARE INC. and COMPASS GROUP USA, INC.,

Defendant(s).

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**SUMMONS AND VERIFIED COMPLAINT**

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Neimark  
Coffinas  
& Lapp LLP

*Attorneys for Plaintiff(s)*  
37 Congers Road  
New City, New York 10956-5135  
(845) 638-3012

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**DEPARTMENT OF STATE**

One Commerce Plaza  
99 Washington Avenue  
Albany, NY 12231-0001

Return Services Requested

